



GOTTLIEB & GREENSPAN

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January 21, 2025

SO ORDERED.

Via ECF

Honorable Jamel K. Semper
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

/s/ Jamel K. Semper
HON. JAMEL K. SEMPER
United States District Judge

January 22, 2025

RE: Rowe Plastic Surgery of NJ LLC v. Leading Edge Administrators
Docket No.: 2:24-cv-09533-JKS-MAH

Dear Judge Semper,

This firm represents the Plaintiff in the above-captioned matter. On December 12, 2024, Defendant filed a Motion to Dismiss the Amended Complaint in this matter. After Plaintiff filed a Rule 7.1(d)(5) letter for an automatic extension, the current return date on the Motion to Dismiss is January 21, 2025. Plaintiff requested an adjournment, which was granted, and the current return date is February 3, 2025. Plaintiff hereby requests an additional adjournment, as the parties are currently actively engaged in settlement negotiations. Plaintiff is optimistic that this matter will be settled prior to the new due date for its opposition; however, it is prepared to move forward should the negotiations falter.

As always, we thank the Court for its courtesies in this regard.

Very truly yours,

s/ Joseph G. Devine, Jr.
Joseph G. Devine, Jr.

Cc: All counsel of record via ECF